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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

PROGRESSIVE CASUALTY
INSURANCE COMPANY,

Plaintiff,

v.

JACKIE K. DELANEY; LARRY E.
CARTER; MARK A. STOUT;
KENNETH TEMPLETON; JOHN
SHIVELY; STEPHEN C. KALB;
JEROME F. SNYDER; HUGH
TEMPLETON; and RICK
DRESCHLER,

Defendants.

Case No. 2:11-cv-00678-LRH-PAL

**STIPULATION TO EXTEND
STAY OF PROCEEDINGS
(FOURTH REQUEST)**

1 Pursuant to the Court's January 7, 2015 Order, the parties hereby
2 submit this status report and further stipulate and request that the Court
3 stay all deadlines in this case until January 30, 2015, based on the following:

4 1. On November 19, 2014, the parties mediated under the
5 guidance of mediator Ken Kendrick of Kendrick Conflict Resolution.

6 2. After lengthy negotiations, the parties reached a settlement
7 in principle.

8 3. While some of the corporate parties got final authority for
9 the agreement in principle to become a final agreement, the parties filed a
10 stipulation on November 21, 2014 (#200) to stay all proceedings for ten days.
11 On November 25, 2014, the Court entered an order to stay proceedings until
12 December 2, 2014.

13 5. To allow the parties time to prepare the final settlement
14 agreement and dismissal paperwork, the parties filed a stipulation on
15 November 26, 2014 (#202) to stay all proceedings until December 29. On
16 November 28, 2014, the Court entered an order staying proceedings until
17 December 29, 2014 and ordering the parties to file a status report by January
18 6, 2015 advising the court when they expect to finalize their settlement and
19 file a stipulation for dismissal. At the parties' joint request, on December 29,
20 2015 (#205), the Court further extended the stay until January 16, 2015 to
21 allow the parties to finalize settlement and dismissal paperwork. On
22 January 7, 2015 (#207), after the parties filed their joint status report, the
23 Court ordered the parties to submit a revised status report by January 16,
24 2015.

25 6. The parties have exchanged draft settlement agreements
26 and dismissal paperwork, held teleconferences, and are discussing some of
27 the terms of their agreement. Due to the number of parties involved, the
28 process has been lengthy but the remaining terms under discussion are

1 limited. The parties are trying to complete the settlement agreement by
 2 January 30, 2015, and will promptly advise the Court if any issues arise.

3 7. The cost of completing the upcoming briefing and
 4 discovery deadlines would undermine the agreed-upon settlement
 5 arrangement because of the financial and time expense involved with
 6 fulfilling those deadlines. Temporarily staying those deadlines would
 7 effectuate the parties' mutual desire to decrease the cost of litigation pending
 8 settlement.

9 The parties submit that good cause exists to stay all proceedings
 10 in this case until January 30, 2015. The parties therefore request that the
 11 Court enter an order granting such a stay and ordering the parties by
 12 January 30, 2015 to file a supplemental status report advising the court when
 13 they expect to finalize their settlement and file a stipulation for dismissal.

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Deposit Insurance Company as
Receiver for Sun West Bank

ORDER

IT IS SO ORDERED. All proceedings in this case are stayed until January 30, 2015 to allow the parties to finalize settlement and dismissal paperwork. The parties will file a supplemental status report by January 30, 2015 advising the court when they expect to finalize their settlement and file a stipulation for dismissal.

DATED this 22nd day of January, 2015.



LARRY R. HICKS
UNITED STATES DISTRICT JUDGE